

LAGOMARSINO LAW
 3005 West Horizon Ridge Parkway, #241, Henderson, Nevada 89052
 Telephone (702) 383-2864 Facsimile (702) 383-0065

LAGOMARSINO LAW
 ANDRE M. LAGOMARSINO, ESQ. (#6711)
 CORY M. FORD, ESQ. (#15042)
 3005 W. Horizon Ridge Pkwy., #241
 Henderson, Nevada 89052
 Telephone: (702) 383-2864
 Facsimile: (702) 383-0065
 aml@lagomarsinolaw.com
 cory@lagomarsinolaw.com
Attorneys for Plaintiff Ti'a Joseph

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TI'A JOSEPH, an individual;

Plaintiff,

v.

ELITE MEDICAL CENTER, LLC, a
 Domestic Limited-Liability Company;

Defendant.

Case No.: 2:22-CV-00703-JAD-NJK

STIPULATION AND ~~[PROPOSED]~~
ORDER RESCHEDULING THE EARLY
NEUTRAL EVALUATION (ECF NO. 9)

(First Request)

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

Plaintiff TI'A JOSEPH ("Plaintiff") and Defendant ELITE MEDICAL CENTER, LLC
 ("Defendant"), by and through their counsel of record, hereby stipulate and agree to request that the
 court reschedule the **August 15, 2022, Early Neutral Evaluation.**

Plaintiff's counsel, which is a small firm of only two attorneys, is currently preparing for a
 two-week long trial in the United States District Court, District of Nevada, Case No.2:17-cv-00880-
 JCM-VCF, which is on stack and very likely to go on August 8, 2022. Additionally, the head
 paralegal at Plaintiff's firm has been on maternity leave since April 20, 2022 and one of the two
 attorneys for Plaintiff's counsel as well as the office manager were just recently out with Covid for
 multiple days. As a result, Plaintiff's firm has been significantly hindered in its ability to devote
 adequate time to prepare for the ENE and attend the ENE as Plaintiff's counsel will very likely be in
 trial during the currently scheduled date. This Stipulation is made in good faith and is not intended
 for purposes of delay.

...

The parties offer the following alternative dates for the court's consideration:

1. Wednesday, August 24, 2022
2. Thursday, August 25, 2022
3. Friday, August 26, 2022
4. Wednesday, August 31, 2022 (preferred)
5. Thursday, September 1, 2022 (preferred)

IT IS HEREBY STIPULATED AND AGREED that all parties are requesting to reschedule the August 15, 2022 ENE to one of the above dates.

DATED this 19th day of July 2022

DATED this 19th day of July 2022

/s/ Cory M. Ford

LAGOMARSINO LAW

Andre M. Lagomarsino, Esq. (#6711)
Cory M. Ford, Esq. (#15042)
3005 W. Horizon Ridge Pkwy., #241
Henderson, Nevada 89052
Telephone: (702) 383-2864
Attorneys for Plaintiff Ti'a Joseph

/s/ Crane M. Pomerantz

CLARK HILL PLLC

Crane M. Pomerantz (#14103)
Nicholas M. Wiczorek (#6170)
3800 Howard Hughes Parkway, Suite 500
Las Vegas, Nevada 89169
Telephone: (702) 697-7545
Attorneys for Defendant Elite Medical Center, LLC

ORDER

IT IS SO ORDERED. The Early Neutral Evaluation scheduled for August 15, 2022 is **VACATED** and **RESET** for **Wednesday, August 24, 2022 at 10:00 a.m.** via video conference. IT IS FURTHER ORDERED that the confidential evaluation statements are due by Noon on **Wednesday, August 17, 2022**. All other provisions of the Court's Order (ECF No. 9) remain in effect.

DATED: July 21, 2022

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE